

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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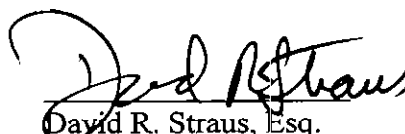
POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R97-1

THE AMERICAN BUSINESS PRESS' FIRST SET OF  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS DIRECTED TO USPS WITNESS TOLLEY  
(ABP/USPS-T-6-1-5)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the American Business Press hereby submits the attached interrogatories and requests for production of documents to USPS Witness Tolley (ABP/USPS-T-6-1-5). If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



David R. Straus, Esq.  
Stephen M. Feldman, Esq.  
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Counsel for the American  
Business Press

August 20, 1997

FIRST INTERROGATORIES AND REQUEST  
FOR PRODUCTION OF DOCUMENTS  
OF AMERICAN BUSINESS PRESS (ABP)  
TO USPS WITNESS GEORGE TOLLEY (USPS-T-6)  
ABP/USPS-T-6-1-5

ABP/USPS-T-6-1

At page 104, lines 19-20, you testify that a number of publishers use alternate delivery to save on postage costs. What is the source of that information? Please provide any studies or data on which you relied.

ABP/USPS-T-6-2

With respect to periodicals delivered by alternate means, what percentage of the following types of publications are delivered by such means: daily newspaper, weekly newspaper, weekly magazine, monthly magazine?

ABP/USPS-T-6-3

At page 104, lines 19-20, you testify that a number of publishers use alternate delivery to save on postage costs. Is that the only reason? What other reasons are there?

ABP/USPS-T-6-4

At page 104, lines 19-20, you testify that a number of publishers use alternate delivery to save on postage costs. Do publishers pay more for alternate delivery than they would pay for postage in order to obtain better service?

ABP/USPS-T-6-5

At page 104, lines 19-20, you testify that a number of publishers use alternate delivery to save on postage costs. You cite a couple of press reports for your sources of information.

[a] Are you aware of any recent Postal Service studies of the alternate delivery of periodicals?

[b] Were you provided with copies or summaries of any such studies? If so, please identify.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing documents in accordance with Section 12 of the Commission's Rules of Practice.

A handwritten signature in black ink, appearing to read "D. R. Straus", is written over a horizontal line.

David R. Straus  
Stephen M. Feldman

Dated: August 20, 1997